



365 RIFLE CAMP ROAD
WOODLAND PARK, NEW JERSEY 07424
973-247-9000

973-247-9199 (FAX)

1500 LAWRENCE AVENUE
CN7807
OCEAN, NEW JERSEY 07712
732-922-1000
732-922-6161 (FAX)

214 CARNEGIE CENTER
SUITE 112
PRINCETON, NEW JERSEY 08540
609-751-5551

140 GRAND STREET
SUITE 705
WHITE PLAINS, NEW YORK 10601
800-569-3886

41 UNIVERSITY DRIVE
SUITE 400
NEWTOWN, PENNSYLVANIA 18940
267-757-8792

www.ansellgrimm.com

RICHARD B. ANSELL ♦
PETER S. FALVO, JR.
JAMES G. AARON
PETER B. GRIMM
MITCHELL J. ANSELL
BRIAN E. ANSELL ♦
ALLISON ANSELL ♦†
MICHAEL V. BENEDETTO
DAVID B. ZOLOTOROFE
DONNA L. MAUL♦
RICK BRODSKY♦
LAWRENCE H. SHAPIRO♦
ROBERT A. HONECKER, JR. ☐
JENNIFER S. KRIMKO
FREDERICK C. RAFFETTO♦
JOSHUA S. BAUCHNER♦
DAVID J. BYRNE♦
ANDREA B. WHITE ♦♦
EDWARD J. AHEARN

JASON S. KLEIN♦
MELANIE J. SCROBLE
BARRY M. CAPP♦△
DOUGLAS A. DAVIE♦
ELYSA D. BERGENFELD
RICHARD B. LINDERMAN♦
CRAIG D. GOTILLA♦
KEVIN M. CLARK
KRISTINE M. BERGMAN♦
JESSICA T. ZOLOTOROFE
TARA K. WALSH♦
RAHOOL PATEL♦
NICOLE D. MILLERO♦
ALFRED M. CASO
ANTHONY J. D'ARTIGLIO♦
SETH M. ROSENSTEIN♦
ASHLEY V. WHITNEY♦
COURTNEY E. DUNN♦

COUNSEL
HON. ANTHONY J. MELLACI, JR., J.S.C. (RET)
STACEY R. PATTERSON♦
JAMES A. SYLVESTER
ROY W. HIBBERD △
HON. RAYMOND A. HAYSER, J.T.C. (RET)
KELLY M. CAREY

RETIRED
ROBERT I. ANSELL
LISA GOLDWASSER♦

IN MEMORIAM

LEON ANSCHELEWITZ (1929-1986)
MAX M. BARR (1929-1993)
MILTON M. ABRAMOFF (1935-2004)
DAVID K. ANSELL† (1962-2019)

LICENSED ALSO IN:
△ D.C. □ MASS. □ N.Y. □ WASH.
□ PENN. ~ FLA. □ CALIF.

† FELLOW, AMERICAN
ACADEMY OF MATRIMONIAL
LAWYERS

‡ CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS A
CIVIL TRIAL ATTORNEY

§ CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS A
CRIMINAL TRIAL ATTORNEY

• CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS A
MATRIMONIAL LAW ATTORNEY

**Reply To: Woodland Park
Direct Dial: (973) 925-7341
Fax: (973) 247-9199
E-mail: jb@ansellgrimm.com**

August 4, 2021

Via ECF

Hon. Debra Freeman, U.S.M.J.
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Jeffrey M. Goldman v. Sol Goldman Investments LLC, et al.*
Civil Action No.: 1:20-cv-6727

Dear Judge Freeman:

As you are aware, this firm represents Defendants Sol Goldman Investments LLC (“SGI”), Solil Management, LLC (“Solil”), and Jane H. Goldman (collectively, “Defendants”) in the above styled matter.

At last Friday’s telephonic discovery conference, the Court directed the parties to provide a joint status update by Tuesday (yesterday) regarding the scheduling of depositions and other issues. We apologize for the delay in submitting this joint letter but we only received a response from Plaintiff’s counsel to our inquiries earlier this afternoon. To that end, the parties have agreed as follows:

- Plaintiff’s deposition will commence at 10:00am on August 17, 2021 (remotely);

Honorable Debra Freeman, U.S.M.J.

August 4, 2021

Page 2

- Defendant Jane Goldman's will commence at 10:00am on August 18, 2021 (remotely); and
- The 30(b)(6) depositions for Defendants Solil Management LLC and Sol Goldman Investments LLC will follow on August 18, 2021 (remotely).

We have been unable to schedule the deposition of Judith Brener as she is traveling and we have been unable to contact her. However, she is anticipated to return on August 12 and we will work to schedule her deposition for no later than September 15, 2021, based on her schedule and the availability of counsel.

Defendants are still awaiting signed HIPAA authorization forms and a list of medical providers from Plaintiff's counsel, who advised upon inquiry that the list will be provided by the afternoon of August 5 at the latest.

We are available to discuss this, or any other matter, at the Court's convenience.

Respectfully,



Joshua S. Bauchner, Esq.
Ansell Grimm & Aaron, P.C.
Attorneys for Defendants